

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	CRIMINAL NO. 04-10293-JLT
)	
)	
ANTHONY P. RAYMOND)	
Defendant.)	

GOVERNMENT'S REVISED REQUESTED VOIR DIRE QUESTIONS

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, respectfully requests that the Court ask prospective trial jurors in the above-captioned case the following questions:

1. Have any of you, or any members of your family or close friends, been a victim of a crime involving a firearm or a bank robbery? If so, is there anything about this experience which would in any way affect your ability to render a fair and impartial verdict?
2. Do any of you have feelings about guns or gun laws that may affect your ability to render a fair and impartial verdict?
3. Do any of you have feelings about banks or laws making it illegal to take money by force from banks that may affect your ability to render a fair and impartial verdict?
4. Do any of you, or any members of your immediate family or close friends, own firearms?
5. This is a criminal case wherein the law sets forth certain punishments to be applied in the sole discretion of the Judge, within bounds as set forth by Congress. Are there any of you who, for religious, moral, ethical or philosophical reasons, would simply rather not

- be called upon to decide the guilt or innocence of the accused?
6. Are you, a family member, or a close friend or business associate involved in the criminal justice system as a prosecutor, a defense attorney, an employee of either a prosecutor or a defense attorney, or as a law enforcement officer?
 7. The government plans to call witnesses in this case who have pled guilty to crimes, and agreed to cooperate with the government in the hopes that they can reduce their sentences for the crimes they committed. Do you have strong feelings about plea agreements or cooperating witnesses which might influence your consideration of the evidence in this case?
 8. Do you conscientiously believe you can render a fair and impartial verdict free from any prejudice or bias for or against the Government or the defendant?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ S. Waqar Hasib
Paul R. Moore
S. Waqar Hasib
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney for defendant ANTHONY P. RAYMOND, Roger Witkin, Esq., on this 6th day of October, 2005, via electronic filing and first class mail.

/s/ S. Waqar Hasib
S. Waqar Hasib
Assistant U.S. Attorney